

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Crim No. 13-2106-MBB
)
DZHOKHAR A. TSARNAEV,)
 Defendant)

JOINT MOTION TO CONTINUE PROBABLE CAUSE HEARING

The United States of America, by and through its undersigned counsel, and defendant Dzhokhar Tsarnaev, by and through his undersigned counsel, hereby jointly request that the Court continue the probable cause hearing to July 2, 2013, or a date thereafter that is convenient to the parties and the Court. In support of this motion, the parties state the following.

1. Dzhokhar Tsarnaev is charged in a complaint with using a weapon of mass destruction resulting in death, in violation of 18 U.S.C. § 2332a, and malicious destruction of property resulting in death, in violation of 18 U.S.C. § 811(d). He was arrested on April 19, 2013, and had his initial appearance on April 22, 2013. The government moved for preventive detention, and, on April 22, 2013, Tsarnaev agreed to voluntary detention without prejudice. A probable cause hearing is currently scheduled to take place on May 30, 2013.

2. In view of the complex factual and legal issues present in this case and the need for adequate time to obtain and review evidence, the parties jointly move to continue the probable cause

hearing to July 2, 2013, or a date thereafter convenient to the parties and the Court.

Respectfully submitted,

DZHOKHAR TSARNAEV

CARMEN M. ORTIZ
United States Attorney

By: /s/ Miriam Conrad
Miriam Conrad, Esq.
William Fick, Esq.
Timothy Watkins, Esq.
Judy Clarke, Esq.
Attorneys for Dzhokhar Tsarnaev

By: /s/ William Weinreb
William D. Weinreb
Aloke S. Chakravarty
John A. Capin
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I certify that this document was filed on May 20, 2013, through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ William D. Weinreb
WILLIAM D. WEINREB
Assistant U.S. Attorney